

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

**HTG REAL PROPERTY MANAGEMENT
INC

DEBTOR IN POSSESSION**

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**BANKRUPTCY NO. 09-53282
CHAPTER 11 PROCEEDING**

APPLICATION TO USE CASH COLLATERAL

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now HTG REAL PROPERTY MANAGEMENT INC, Debtor In Possession, by and through its attorney of record, Steven G. Cennamo, and would show the court as follows:

1. Debtor filed a Petition for Relief under Chapter 11 of the United States Bankruptcy Code on or about August 27, 2009.
2. Debtor is or will be in possession of alleged cash collateral, which is rent collected from real property owned by debtor.
3. Debtor, in order to continue to operate its business, pay operating expenses and to pay utility bills and to fund the plan, needs to utilize this cash collateral.
4. The following creditors assert an interest in the aforesaid cash collateral:

AR Utilities
2330 Schuwirth Rd
Converse, TX 78109

First National Bank
7925 N. New Braunfels
San Antonio, TX 78209

Holt Texas Ltd d/b/a Holt Cat
3302 S WW White Rd.

San Antonio, TX 78222

Jacobs Family Trust
c/o Eric D. Sherer
11124 Wurzbach Rd., Suite 100
San Antonio, TX 78230

5. The indebtedness claimed by First National Bank is primarily monies owed to the creditor for money loaned. A lien is claimed on rent due to liens allegedly created in recorded Deeds of Trust on certain tracts of real property.

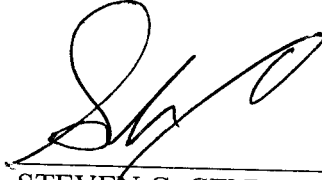
6. The indebtedness claimed by AR Utilities, Holt Texas Ltd., and Jacobs Family Trust (hereinafter the "Judgment Creditors") is primarily monies owed to the creditors based upon judgments entered against Debtor. The alleged liens are based upon Abstract of Judgments recorded in the real property records of Bexar County within 90 days of the Chapter 11 case being filed and/or turnover orders obtained against debtor within 90 days of the Chapter 11 case being filed. Debtor asserts that said alleged liens are preferential transfers and disputes that either the recorded abstract of judgments or the turnover orders create a lien on rent.

7. Debtor proposes providing adequate protection to these creditors by granting First National Bank a first position lien on post petition rent from the real property on which it has a lien to the extent a pre-petition lien exists. Debtor proposed providing adequate protection to the Judgment Creditors by granting the Judgment Creditors a lien on post petition rent from the real property on which First National Bank does not have a lien and on which they have a lien in the order in which the abstract of judgments were recorded to the extent a pre-petition lien exists and/or the lien is not set aside as a preferential transfer.

WHEREFORE, PREMISES CONSIDERED, Debtor requests an expedited hearing on Debtor's proposed action and that it be authorized to use said cash collateral to continue daily

operations.

Respectfully submitted,



STEVEN G. CENNAMEO
2929 Mossrock, Suite 117
San Antonio, TX 78230
(210) 979-9299
(210) 342-3633 (Fax)
State Bar No. 04045600

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application to Use Cash Collateral has been telecopied, delivered by ECF or delivered by U.S. Mail to the following creditors and parties in interest and by U.S. Mail to all other creditors and parties in interest on the attached Exhibit "A" on this the 30th day of August, 2009:

HTG Real Property Management Inc 24165 W. IH 10 Suite 217-408 San Antonio, TX 78257	VIA US MAIL
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U.S. TRUSTEE P.O. BOX 1539 SAN ANTONIO, TEXAS 78212	VIA ECF
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AR Utilities 2330 Schuwirth Rd Converse, TX 78109	VIA US MAIL
---	-------------

First National Bank 7925 N. New Braunfels San Antonio, TX 78209	VIA US MAIL
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Holt Texas Ltd d/b/a Holt Cat	VIA US MAIL
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3302 S WW White Rd.
San Antonio, TX 78222

Jacobs Family Trust
c/o Eric D. Sherer
11124 Wurzbach Rd., Suite 100
San Antonio, TX 78230

TELECOPIED 696-9675

Kathleen Hurren
Attorney for AR Utilities
2008 N.W. Military Highway
San Antonio, TX 72813

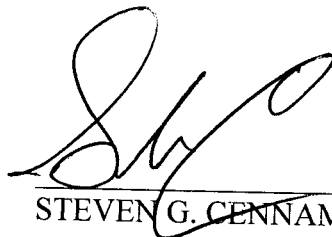
TELECOPIED 341-6939

First National Bank
c/o Eric D. Sherer
11124 Wurzbach Rd., Suite 100
San Antonio, TX 78230

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Karla R. Pascarella
Attorney for Holt Texas Ltd.
Barton, East & Caldwell, L.L.P.
One Riverwalk Place, Suite 1825
700 North St. Mary's Street
San Antonio, TX 78205

TELECOPIED 255-8999



STEVEN G. CENNAMO

**HTG REAL PROPERTY
MANAGEMENT INC
BANKRUPTCY NO. 09-53282
All creditors and parties in interest
Exhibit "A"**

Airtron
13718 Lookout Road
San Antonio, TX 78233

American Automatic Sprinklers
1223 Safari
San Antonio, TX 78216

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Washington, D.C. 20530

Ball & Weed
1001 Reunion Pl Blvd.
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San Antonio, TX 78216

Cortez Custom Cabinets
910 E. Lee
Pharr, TX 73577

Edward J. Arriola Sr.
Randal Arriola
3275 West Ina Road, Suite 125
Tucson, AZ 85741

First National Bank of Edinburg
7925 N. New Braunfels
San Antonio, TX 78209

Gerald Bates
13018 Oxnard Street
Woodland Hill, CA 91367

Hollerman Development
403 Dividend, #101
San Antonio, TX 78219

Adolfo Berjarano
16311 Ventura Blvd., #1210
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Chino, CA 91708

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Burbank, CA 91505

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San Antonio, TX 78230

Frantz Kenol
Cynthia Kenol
6579 Prestwick Dr.
Highland, MD 20777

Gravel Supply
P.O. Box 240935
San Antonio, TX 78224

Hollywood Crawford
11234 Gordon Road
San Antonio, TX 78216

ADT Security Services
P.O. Box 55120
Jacksonville, FL 32255

Allied Waste Services
4542 SE Loop 410
San Antonio, TX 76111

AR Utilities
2330 Schuwirth Rd
Converse, TX 78109

Ava Teherani
18340 Ventura Blvd. #214
Tarzana, CA 91350

Bruce Neyland
14250 Northbrook Drive
Suite 150
San Antonio, TX 78232

Double H. Landscaping
P.O. Box 829
La Coste, TX 78030

Ernesto Silva
3428 Mainve Ave.
Baldwin Park, CA 94501

Frost Geo Sciences
13402 Western Oak
Helotes, TX 78023

Guerrero CPA
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San Antonio, TX 78216

Holt Caterpillar
3302 S WW White Rd.
San Antonio, TX 78222

Internal Revenue Service
P. O. Box 21126
Philadelphia, PA 19114

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San Antonio, TX 78237

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Walnut, CA 91789

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San Antonio, TX 78228

Manuel & Stacey Martinez
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Alameda, CA 94501

McCoy's Building & Supply Center
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San Marcos, TX 78667

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Los Angeles, CA 90035

Roxanne Whitehouse
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Chino, CA 91708

Landra Crow
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Stanley Salah
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Morgan Hill, CA 95037

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San Jose, CA 95130

Pro-Vigil
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Suite 300
San Antonio, TX 78217

Salvador L. & Linda Galvez
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Walnut, CA 91789

Security Fire Systems
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Coppell, TX 75019

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San Antonio, TX 78231

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Panorama City, CA 91402

Mauricio Bejarano
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Encino, CA 91436

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Kimberly K. St. Onge
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Tucson, AZ 85741

Rick Lee
5413 Cheyenne Street
Antioch, CA 94531

San Antonio National Bank
c/o Scott Farrimon
112 East Pecan Street, Ste 700
San Antonio, TX 78205

Silvio Brigliadoro
Eduardo Barillas
5431 Skyloft Dr.
Riverside, CA 92509

Stone & Soil
26923 IH 10 W
Boerne, TX 78006

Sylvia S. Romo, CPA
Bexar County Assessor-Collector
P.O. Box 839950
San Antonio, Texas 78283-3950

TCL Construction
1131 Babcock Rd, #150
San Antonio, TX 78201

The Jacob Family Trust
16 Crockett
Ivin, CA 92620

The Minkov Family Trust
c/o Eric D. Sherer
11124 Wurzbach Rd., Suite 100
San Antonio, TX 78230

TopNotch Electric
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San Antonio, TX 78227

U.S. Attorney/IRS
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San Antonio, Texas 78295-1539

United States Attorney- IRS
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